

**DECLARATION OF RUFUS L.M. JENKINS**  
**PURSUANT TO 28 U.S.C. § 1746**

I, Rufus L.M. Jenkins, hereby state that, unless otherwise specified, I have personal knowledge of the facts set forth below, and if called as a witness, would testify competently thereto as follows:

1. I am a United States citizen over the age of 18. I am employed by the Federal Trade Commission (“FTC”) as a forensic accountant in the Bureau of Consumer Protection’s Division of Litigation Technology & Analysis (“DLTA”). I have worked with the FTC since April 2019, first in the Bureau of Consumer Protection’s Division of Financial Practices as an investigator and, starting in October 2020, in DLTA as a forensic accountant. Before that, I worked for eight years in a forensics practice at one of the Big Four public accounting firms. I earned my Master of Accountancy and Master of Business Administration from Mercer University. I am a licensed Certified Public Accountant and a Certified Fraud Examiner. My office address is 600 Pennsylvania Avenue, NW, Mail Stop CC-9111, Washington, DC 20580.

2. In my capacity as a forensic accountant at the FTC, I was assigned to work on the FTC’s investigation of Empire Holdings Group LLC (“Empire Holdings”), also doing business as Ecommerce Empire Builders and Storefunnels.net, (collectively, the “Corporate Defendant”) and Peter Prusinowski, also known as Peter Pru, (the “Individual Defendant”). Throughout this declaration, I will refer to the subjects of the FTC’s investigation collectively as “Defendants.” FTC Counsel informed me that the Defendants sell products and services related to online businesses.

3. FTC Counsel requested that I summarize certain information contained in records provided by Stripe, PayPal, and TD Bank in response to civil investigative demands issued by the FTC. Specifically, I was asked to summarize the following:

i. the net revenue of Defendants and their related companies derived from their sales of products and services related to online businesses during the period January 1, 2021 through February 29, 2024 (“relevant time period”);

ii. the return rates at Stripe and PayPal; and

iii. the outflows from Defendants’ accounts that received consumer funds to:

(a) Individual Defendant, (b) Individual Defendant-related companies, (c) financial services companies, and (d) personal expenditures.

4. In connection therewith, I reviewed records and data concerning Defendants’ accounts, with limited information pertaining to individual accounts at TD Bank. The financial accounts’ activity covered by my review is January 1, 2021 through February 29, 2024. Because of the voluminous number of records, I do not attach the documents that I examined here, which include, for example, account opening and profile information, monthly statements, wire transfers, check images, and the like. Instead, a list of the Stripe, PayPal, and TD Bank accounts whose records I reviewed, including account names, last four characters of account identifiers, and account balances as of the last statement reviewed, is appended as Jenkins **Attachment (“Att.”) A**. I will refer to these financial accounts collectively as the “Accounts of Interest.” The Individual Defendant owns or controls each of the Accounts of Interest. In this declaration, I refer to Accounts of Interest using the following protocol: an abbreviated trade name (in whose name the account is held), financial service provider, and the last four characters of the account identifier. I have access to and maintain true and correct copies of all the records that I reviewed.

5. Among the records produced by Stripe and PayPal, the FTC obtained transaction logs of the Defendants’ and related companies’ activity. In addition to counterparty information, details include, among other things, unique transaction identifiers, dates, amounts (the Stripe

amounts are in cents which I converted to dollars and cents), an indication of whether a transaction was a debit (money out) or credit (money in), and usually a brief reason for a transaction. The transaction logs covered payments received, payments sent, deposits, withdrawals, refunds, reversals, and chargebacks.

6. For the Corporate Defendant's TD Bank Accounts of Interest, summaries for activity up through February 29, 2024 were prepared using a financial investigation tool from Actionable Intelligence Technologies, Incorporated, called "Comprehensive Financial Investigations Solution" ("CFIS"). Numerous other government agencies also use CFIS, including, but not limited to, the Internal Revenue Service, the FBI, the Organized Crime Drug Enforcement Task Force, several U.S. Attorney's offices, and the United States Secret Service. Among other things, CFIS uses proprietary technology to convert paper and/or electronic account records from financial institutions into an investigative database that can be searched, analyzed, and used to issue a variety of reports, Microsoft Excel spreadsheets, and other exhibits.

7. The first step in using CFIS is to load the relevant account statements. After the statements are loaded, CFIS imports and processes the statements using Intelligent Document Analyzers that rely on proprietary algorithms and Optical Character Recognition technology to create a searchable database. Intelligent Document Analyzers are document format readers associated with a particular bank or financial statement. After a statement has been indexed and processed, the CFIS database record for that statement is reconciled in CFIS with the original version of the statement obtained in the proceeding (*i.e.*, the statement produced by a bank or financial institution) to ensure accuracy of its details, such as the account a transaction is associated with, the date a transaction posted to an account, the transaction amount, transaction category codes, and whether the transaction is an inflow or outflow of funds.

8. In the instant matter, CFIS was used to generate a table containing the financial transactions for each of the Corporate Defendant's TD Bank Accounts of Interest. The table was then exported into Excel. A review of the transactions within the Excel spreadsheet along with, in numerous instances, the underlying data, including copies of deposited items, checks paid, and wire notices, allowed counterparties to be identified. Counterparties were then researched, using publicly available information, to better understand whom money flowed to or from and to help make connections. In numerous instances, a brief description of the nature of a transaction (*e.g.*, "merchant credit" or "apparent consumer deposit") or, in some instances, a remark (*e.g.*, "asset diversion") was included to add clarity and aid in identifying sources and uses of funds. Details of checks paid were also entered into the Excel spreadsheet.

**I. Net Revenue: January 1, 2021 through February 29, 2024**

9. As part of my analysis, I calculated the estimated net revenue the Defendants and their related companies received in their accounts at Stripe, PayPal, and TD Bank from their sales of products and services related to online businesses during the period January 1, 2021 through February 29, 2024. By my calculation, I estimate their combined net revenue is, at least, \$14,587,737.22 during the relevant time period. I summarize the net revenue by entity in the table below.

*-continued on next page-*

Item Count	Defendant	Financial Service Provider\Last 4 Characters of Account	Gross Revenue	Chargebacks\ Reversals\ Refunds	Net Revenue
1	Empire Holdings Group LLC	Stripe – AsdA	\$9,289,861.49	(\$499,310.64)	\$8,790,550.85
2	Ecommerce Empire Builders	Stripe – SXHp	729,679.03	(28,671.58)	701,007.45
3	Empire Holdings Group LLC	PayPal – 3916	669,107.58	(230,782.10)	438,325.48
4	Peter Pru *	PayPal – 9954	1,891.23	0.00	1,891.23
5	Empire Holdings Group LLC	TD Bank – 8836	0.00	(15,000.00)	(15,000.00)
6	Empire Holdings Group LLC	TD Bank – 9912	4,440,186.85	(30,000.00)	4,410,186.85
<b>Subtotal - Defendants</b>			<b>\$15,130,726.18</b>	<b>(\$803,764.32)</b>	<b>\$14,326,961.86</b>

Item Count	Related Company	Financial Service Provider\Last 4 Digits	Gross Revenue	Chargebacks\ Reversals\ Refunds	Net Revenue
7	Empire Partner Network LLC	PayPal – 2440	141,931.87	0.00	141,931.87
8	Empire Partner Network LLC	TD Bank – 8811	118,843.49	0.00	118,843.49
<b>Subtotal – Related Companies</b>			<b>\$260,775.36</b>	<b>\$0.00</b>	<b>\$260,775.36</b>
<b>Grand Total</b>			<b>\$15,391,501.54</b>	<b>(\$803,764.32)</b>	<b>\$14,587,737.22</b>

\* This is the business name for this account listed in PayPal’s records.

10. Starting with the Stripe data, I added up the amounts in the “Transactions” tab, relying on the column headers “date\_and\_time,” “amount\_cents,” “description,” “name\_provided,” “email\_provided,” “address\_line\_1,” and “customer\_ip\_address.” After finding transactions associated with the Individual Defendant’s name, email address, or current or previous addresses, I identified other transactions that list the same IP addresses.<sup>1</sup> Some of these transactions indicated they were a test. Therefore, I identified others designated as a test. I excluded payments to and from the Individual Defendant, transactions with the same IP address as the Individual Defendant, and test transactions. Transactions were frequently in common amounts and, in numerous instances, included a description of a product or service associated with online businesses, such as “sales funnel” or “ecommerce.” From this amount, I deducted funds returned to consumers during the relevant time period shown in the “Refunds” and

<sup>1</sup> An IP (Internet Protocol) address is a uniquely-identifying string of numbers assigned to each Internet-connected device or any device connected to a network. See <https://www.whatismyip.com/>.

“Chargebacks” tabs. In Refunds, I relied upon the data in the column header “charge\_id,” “refund\_date,” and “refund\_amount\_cents.” I also created a formula that used a VLOOKUP function to find refunds that have the same charge ID as one of the transactions identified as associated with the Individual Defendant. Since the related revenue was excluded, I left out the refunds connected to the Individual Defendant, too. In Chargebacks, I relied upon the data in the column header “date\_and\_time\_of\_dispute,” “request\_\_amount\_in\_usd,” and “status.” It is my understanding that chargebacks “lost” result in payments to consumers from the Defendants. My calculation is based on the gross receipts; in other words, I did not subtract any fee that Stripe charged to use its service. During the relevant time period, by my calculation, I estimate that through Stripe the Defendants received \$10,019,540.52 and returned \$527,982.22, for a net of \$9,491,558.30, associated with their sales of products and services related to online businesses.

11. Continuing with the PayPal data, I added up the US dollar equivalent amounts of payment inflows (credit) into the PayPal accounts based on the column headers “Parent Txn ID,” “Updated Date,” “Balance Impact [Fiat],” “Transaction Type,” “Status,” “Item Title,” “Subject,” “Notes,” and “Counterparty Name.” Furthermore, I totaled the “parent” transactions with a Status of “completed” or “reversed” and that were updated during the relevant time period. These inflows were frequently in common amounts and, in numerous instances, included a description of a product or service associated with online businesses, such as “sales funnel” or “ecommerce,” in Item Title, Subject, or Notes. From this amount, I deducted funds returned to consumers during the relevant time period, relying on some of the same column headers as above. First, I totaled the outflows (debit) designated as a “chargeback,” “payment refund,” or “Instant Payment Review (IPR) reversal” Transaction Type. Second, I added up the outflow of payments regarding a refund according to the Item Title or Note. I excluded payments to and

from the Individual Defendant. My calculation is based on the gross receipts; in other words, I did not subtract any fee that PayPal charged to use its service. During the relevant time period, by my calculation, I estimate that through PayPal the Defendants received \$670,998.81 and returned \$230,782.10, for a net of \$440,216.71, and their related company, Empire Partner Network LLC, received \$141,931.87 and returned \$0.00, for a net of \$141,931.87, associated with their sales of products and services related to online businesses.

12. Moving to the TD Bank data, I calculated the amount of funds the Defendants and their related companies received due to the likely sale of their products and services related to online businesses. To do this, I totaled amounts from wires, a counter deposit, automated clearing house, or ACH, deposits, and real-time payments, or RTP. Wires were frequently in common amounts and, in numerous instances, included a description of a product or service associated with online businesses, such as “funnel” or “business in a box,” as the reason for the payment. The wires were from a mix of individuals and businesses. The TD Bank accounts had numerous ACH deposits by payment processors. The payment processing entity involved in a particular transaction, however, is not always clear. These ACH transactions, in which a payee could not be individually identified, appear to be batched consumer receipts from credit or debit card transactions. From the amounts received, I deducted funds withdrawn via one wire and two ACH transactions, which indicated in their descriptions that they related to adjustments of previously deposited funds likely due to a reversal, chargeback, or error correction, resulting in a net amount received. I excluded deposits from and payments to both Stripe and PayPal, avoiding double counting, since their associated net revenue is calculated separately above. During the relevant time period, by my calculation, I estimate that through TD Bank the Defendants received \$4,440,186.85 and returned \$45,000.00, for a net of \$4,395,186.85, and its related

company, Empire Partner Network LLC, received \$118,843.49 and returned \$0.00, for a net of \$118,843.49, associated with their sales of products and services related to online businesses.

## II. Return Rates

13. For this calculation, I divided the calculated refunds, chargebacks, and reversals by the Defendants' calculated gross revenue from the Stripe and PayPal records. I summarize the Defendants' return rates in the table below.

Item Count	Defendant	Financial Service Provider\Last 4 Characters of Account	Gross Revenue	Chargebacks\Reversals\Refunds	Return Rate
1	Empire Holdings Group LLC	Stripe – AsdA	\$9,289,861.49	(\$499,310.64)	-5.37%
2	Ecommerce Empire Builders	Stripe – SXHp	729,679.03	(28,671.58)	-3.93%
3	Empire Holdings Group LLC	PayPal – 3916	669,107.58	(230,782.10)	-34.49%
<b>Grand Total</b>			<b>\$10,688,648.10</b>	<b>(\$758,764.32)</b>	<b>-7.10%</b>

## III. Outflows from Accounts of Interest

14. As part of my analysis, I traced the flow of funds from Accounts of Interest to beneficiaries of those funds.

### A. Individual Defendant

15. By my calculation, the Individual Defendant and his spouse received \$681,685.83 from the Corporate Defendants' TD Bank accounts. These transactions are as follows:

- i. Between January 29, 2021 and February 28, 2024, the Individual Defendant's personal joint TD Bank account ending in \*9904 (shared with spouse) received forty-nine (49) transfers in total amounting to \$542,365.14 from Empire Holdings TD Bank – 9912;
- ii. Between On April 26, 2021 and February 21, 2024, the Individual Defendant received a total of \$83,973.09 in thirty-six (36) withdrawals from Empire Holdings TD Bank – 9912;



- iii. Between March 31, 2021 and October 26, 2022, the Individual Defendant's personal joint TD Bank account ending in \*9904 received five (5) transfers in total amounting to \$54,000.00 from Empire Holdings TD Bank – 8836;
- iv. On or around January 22, 2021, check number 179 was paid in the amount of \$847.60 to the Individual Defendant's spouse; and
- v. On or around December 18, 2023, the Individual Defendant withdrew \$500.00 from Empire Holdings TD Bank – 8836.

**B. Individual Defendant-Related Company**

16. By my calculation, according to PayPal records, namely a casefile summary, a company associated with the Individual Defendant—Star Active Sports—received \$2,549,531.45 from the Corporate Defendants' TD Bank accounts. Between January 4, 2021 and February 21, 2024, Star Active Sports received two hundred and twenty-five (225) payments totaling \$2,433,362.05 from Empire Holdings TD Bank – 9912. Between June 2, 2021 and March 3, 2023, Star Active Sports received ten (10) payments totaling \$116,169.40 from Empire Holdings TD Bank – 8836.

**C. Financial Services Companies**

17. By my calculation, between January 5, 2021 and February 29, 2024, the Defendants transferred out \$10,756,527.01 more than they received from financial services companies for a variety of apparent reasons, like credit cards, investment accounts, cryptocurrency, vehicles, and a safety deposit box—but some unknown reasons, as well. These transactions were in the form of ACH debits and checks paid. I summarize these transactions below.

### 1) American Express

18. By my calculation, in nine hundred and thirty-two (932) transactions, between January 5, 2021 and February 29, 2024, \$9,212,365.50 was sent from Empire Holdings TD Bank – 9912 to American Express. The FTC did not obtain records from American Express. Nevertheless, I include these expenses here because the Individual Defendant’s PayPal records show that American Express cards ending in \*1009 and \*3003, which are also listed on a “financials” tab of the Corporate Defendant’s PayPal records, were used to purchase non-business-related items, namely gold, silver, and Pokémon cards. These transactions are as follows:

- i. On or around January 22, 2021, by my calculation, Prusinowski PayPal – 2415 sent Liberty Coin, LLC a total of \$6,494.69, which consisted of \$5,978.79 and \$515.90 purchases of a one-ounce gold bar and silver bar, respectively;
- ii. On or around January 22, 2021, Prusinowski PayPal – 6631 sent \$4,048.68 to APMEX, Inc. for a one-ounce gold bar;
- iii. On or around January 22, 2021, Prusinowski PayPal – 2415 sent \$1,970.38 to Scottsdale Mint LLLP for a one-ounce gold bar;
- iv. By my calculation, Prusinowski PayPal – 2415 sent users of eBay, an online marketplace, a total of \$693.13, which consisted of a \$308.19 on or around February 17, 2021, \$216.40 on or around May 12, 2021, and \$168.54 on or around February 5, 2021, for sets of Pokémon cards; and
- v. On or around January 23, 2021, Prusinowski PayPal – 6631 sent \$20.00 to an eBay user for a bullion storage box.

19. By my calculation, in four (4) transactions, between December 22, 2023 and February 27, 2024, \$105,675.44 was sent from American Express to Empire Holdings TD Bank – 9912.

**2) Charles Schwab**

20. By my calculation, in forty-five (45) transactions, between April 11, 2022 and December 21, 2023, \$679,100.38 was sent from Empire Holdings TD Bank – 9912 to a brokerage account at Charles Schwab.

**3) Veem**

21. By my calculation, in forty-seven (47) transactions, between January 8, 2021 and January 4, 2022, \$545,114.57 was sent from Empire Holdings TD Bank – 9912 to Veem, a global payments platform that allows payments to over a hundred countries.

**4) Capital Bank & Trust**

22. By my calculation, in four (4) transactions, between February 8, 2021 and November 9, 2022, \$127,000.00 worth of checks were paid from Empire Holdings TD Bank – 9912 to an account at Capital Bank & Trust ending in \*1362. The memo lines of the checks paid indicate the checks were meant for a “401K [to] Pete,” “401K [to] Kellie,” “deferral,” and “profit sharing.”

23. On or around January 23, 2024, an additional check of \$50,000.00 was paid from Empire Holdings TD Bank – 8836 to the account at Capital Bank & Trust ending in \*1362.

**5) Coinbase**

24. By my calculation, in seventy-seven (77) transactions, between February 16, 2021 and March 7, 2023, \$154,432.87 was sent from Empire Holdings TD Bank – 9912 to Coinbase, a cryptocurrency exchange platform.

**6) Gemini**

25. By my calculation, in forty-one (41) transactions, between March 9, 2021 and April 4, 2022, \$148,600.00 was sent from Empire Holdings TD Bank – 9912 to Gemini, a cryptocurrency exchange.

26. By my calculation, in five (5) transactions, between May 12, 2022 and May 23, 2022, \$158,100.38 was sent from Gemini to Empire Holdings TD Bank – 9912.

**7) United Bank**

27. By my calculation, in eleven (11) transactions, between April 14, 2023 and February 14, 2024, \$29,493.53 was sent from Empire Holdings TD Bank – 9912 to United Bank.

**8) Venmo**

28. By my calculation, in forty (40) transactions, between May 10, 2021 and January 16, 2024, \$24,844.50 was paid from Empire Holdings TD Bank – 9912 to Venmo.

**9) Toyota Financial Services**

29. By my calculation, in thirty-four (34) transactions, between May 3, 2021 and February 23, 2024, \$21,424.02 was sent from Empire Holdings TD Bank – 9912 to Toyota Financial Services. Monthly payments were \$615.00 but on or around January 23, 2024 changed to \$872.01.

**10) Tesla Finance**

30. By my calculation, in twenty-nine (29) transactions, between January 27, 2021 and May 4, 2023, \$17,727.46 was sent from Empire Holdings TD Bank – 9912 to Tesla Finance. Monthly payments were \$590.64 but on or around May 4, 2023 changed to \$1,189.54.

**11) Fidelity Investments**

31. On or around November 15, 2023, \$7,750.00 was sent from Empire Holdings TD

Bank – 9912 to Fidelity Investments.

**12) Citizens Bank**

32. On or around January 10, 2024, \$2,000.00 was sent from Empire Holdings TD Bank – 9912 to Citizens Bank.

**13) TD Bank**

33. By my calculation, in three (3) transaction, between February 25, 2022 and February 26, 2024, \$450 was paid from Empire Holdings TD Bank – 9912 to TD Bank for a safety deposit box. Annual payments were \$150.

**D. Personal Expenditures**

34. By my calculation, in six (6) transactions, between July 15, 2021 and September 27, 2023, \$51,970 was sent from Empire Holdings TD Bank – 9912 for seemingly personal expenses, such as jewelry, paintings, and landscaping. These transactions were in the form of a wire and checks paid. These transactions are as follows:

- i. On or around October 7, 2022, a \$34,500 wire was sent from Empire Holdings TD Bank – 9912 to Luxury Bazaar, a luxury watch dealer in eastern Pennsylvania;
- ii. On or around July 15, 2021, check number 201 in the amount of \$7,475.00 was paid from Empire Holdings TD Bank – 9912 to an illegible payee for a painting;
- iii. On or around September 27, 2023, check number 187 in the amount of \$6,200.00 was paid from Empire Holdings TD Bank – 9912 to A & Landscaping Services LLC;
- iv. On or around April 24, 2023, check number 204 in the amount of

\$1,945.00 was paid from Empire Holdings TD Bank – 9912 to Oleg Garmash for a painting;

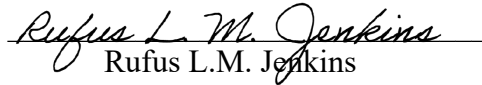
- v. On or around June 8, 2023, check number 150 in the amount of \$1,000.00 was paid from Empire Holdings TD Bank – 9912 to Lookaway Golf Club; and
- vi. On or around February 21, 2023, check number 203 in the amount of \$850.00 was paid from Empire Holdings TD Bank – 9912 to Batchelor Home Improvements for a fireplace.

35. On or around January 26, 2021, \$5,934.84 was paid from Empire Holdings PayPal – 3916 to DBS Coins for a one-ounce gold bar.

36. On or around September 29, 2023, Prusinowski PayPal – 5050 sent \$4,215 to another PayPal user for two one-ounce \$50 gold American Buffalo bullion coin.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 12th day of September 2024.

  
Rufus L.M. Jenkins

# ATTACHMENT A

List of Accounts of Interest				
Item Count	Account Name	Financial Service Provider	Last 4 Characters of Account Identifier	Balance as of February 29, 2024 (excludes reserves)
1	Empire Holdings Group LLC	TD Bank	8836	\$22,636.49
2	Empire Holdings Group LLC	TD Bank	9912	17,913.78
3	Empire Collection LLC	TD Bank	1105	1,655.97
4	Empire Partner Network LLC	TD Bank	8811	1,561.78
5	Empire Realty Holdings LLC	TD Bank	8762	1,502.00
6	Peter & Sophie Prusinowski	TD Bank	9849	Unknown
7	Peter & Kellie Prusinowski	TD Bank	4093	Unknown
8	Peter & Kellie Prusinowski	TD Bank	9904	Unknown
9	Peter Prusinowski	TD Bank	9386	Unknown
10	Empire Holdings Group LLC	PayPal	3916	7,623.90
11	Peter Pru	PayPal	9954	0.00
12	Peter Pru	PayPal	2220	0.00
13	Peter Pru	PayPal	8061	0.00
14	Peter Prusinowski	PayPal	6631	0.00
15	Peter Prusinowski	PayPal	7951	0.00
16	Bulk Box Baits	PayPal	6418	0.00
17	Peter Prusinowski	PayPal	2082	0.00
18	Peter Prusinowski	PayPal	4588	0.00
19	Peter Prusinowski	PayPal	3688	0.00
20	Peter Prusinowski	PayPal	9852	0.00
21	Star Active Sports	PayPal	2794	0.00
22	Peter Prusinowski	PayPal	3192	0.00
23	Peter Prusinowski	PayPal	8998	0.00
24	Peter Prusinowski	PayPal	5050	0.00
25	Peter Prusinowski	PayPal	3269	0.00
26	Peter Prusinowski	PayPal	0601	0.00
27	Peter Prusinowski	PayPal	1504	0.00
28	Peter Prusinowski	PayPal	2415	0.00
29	Empire Partner Network LLC	PayPal	2440	0.00
30	National Anglers Association	PayPal	1270	0.00
31	Empire Holdings Group LLC	Stripe	AsdA	0.00
32	Ecommerce Empire Builders	Stripe	SXHp	0.00
<b>Total</b>				<b>\$52,893.92</b>